

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. 3:20-cv-04688-RS

ANIBAL RODRIGUEZ, SAL CATALDO, JULIAN SANTIAGO, AND SUSAN LYNN HARVEY,
INDIVIDUALLY AND ON BEHALF OF ALL OTHER SIMILARLY SITUATED,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

SECOND SUPPLEMENTAL EXPERT REPORT OF MICHAEL J. LASINSKI

April 25, 2025

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1. EXECUTIVE SUMMARY

1. I provided an expert report in this matter dated February 20, 2023 (“Initial Report”), deposition testimony on June 29, 2023, and a supplemental expert report on January 3, 2025 (“First Supplemental Report”). In my Initial Report, I calculated class-wide unjust enrichment and actual damages for the two classes alleged in the Fourth Amended Complaint for the period July 1, 2016 through December 31, 2022.¹ In my First Supplemental Report, I updated my calculations to extend through September 23, 2024 and account for information that had been made available subsequent to the filing of my Initial Report. In this report (my “Second Supplemental Report”), I further update my calculations of class-wide unjust enrichment and actual damages to reflect additional information made available by Google to Class Counsel subsequent to January 3, 2025 and rulings of the Court. As in my First Supplemental Report, the calculations in this report cover the period July 1, 2016 through September 23, 2024. This Second Supplemental Report is intended to replace my First Supplemental Report.
2. In January and April 2024, after the filing of my Initial Report and deposition, the Court issued its class certification and clarification orders (certifying the “Classes,” together the “Class”). In addition, the parties agreed, and the Court later ruled, that the class period in this matter began on July 1, 2016 and continued through the first day of the class notice period, which was September 23, 2024 (the “Class Period”).²
3. In August 2024, Google produced certain additional Class Member information, including spreadsheets and information related to class notice.³ On October 3, 2024, the parties jointly filed a case management statement that discussed certain disputes, including a request for additional Class Member data.⁴ In January and February 2025, subsequent to the filing of my First Supplemental Report, Google produced additional information relevant to my calculation of damages through the end of the Class Period. On April 18, 2025, Plaintiffs and Google entered a Joint Stipulation regarding Google’s supplemental financial productions.⁵
4. I prepared this Second Supplemental Report to provide updated damages calculations that are consistent with the Court’s class certification and clarification rulings, cover the full Class Period, and account for information first made available by Google to Class Counsel subsequent to January 3, 2025. All of the calculations detailed below and in the attached schedules are based on the same methodologies detailed in my Initial Report.
5. My Initial Report includes my background, and my updated curriculum vitae is attached as Appendix SSA. As before, Ankura is being compensated for my work in this matter at a rate of \$795 per hour. Ankura is also being compensated for the work of Ankura consultants assisting me

¹ I incorporate by reference the information and opinions that I detailed in my Initial Report and further addressed in my June 29, 2023 deposition. All of my calculations in this Second Supplemental Report are consistent with the methodologies detailed in my Initial Report.

² Dkt. 352 (defining classes as “continuing through the present”); Dkt. 370 (moving to define the Class Period as the period from July 1, 2016 to the day the notice program begins); Dkt. 384 (granting motion to clarify class definition); Dkt. 405 (granting Plaintiffs’ motion); Dkts. 412, 413 (stipulation and order that “the Notice Period will commence” by September 23, 2024).

³ An updated list of documents that I have relied upon in this matter is attached as Appendix SSB.

⁴ Joint Case Management Statement, October 3, 2024.

⁵ Joint Stipulation on Google’s Supplemental Financial Productions, April 18, 2025.

in this matter at hourly rates of less than \$795. No part of my compensation, or that of Ankura, depends on the outcome of this litigation.

2. UNJUST ENRICHMENT

6. This unjust enrichment update is straightforward and based on the same methodology detailed in my Initial Report. Based on the Court's class certification and clarification rulings and the additional information produced by Google since August 2024, and using the same methodology detailed in my Initial Report, I updated my original unjust enrichment calculations to account for the additional time between December 31, 2022, the end of the damages period calculated in my Initial Report, and September 23, 2024, the end of the Class Period. I also updated my original unjust enrichment calculations to incorporate information that was unavailable at the time of my Initial Report.⁶ As a result, my calculations now reflect certain actual data that were either projected at the time of my Initial Report or revised by Google in the period thereafter.
7. My updated calculations of Google's unjust enrichment for all Class Members over the full Class Period (July 1, 2016 through September 23, 2024) are detailed in the attached schedules and summarized in the figure below.⁷

⁶ This recently produced information includes, for example, AdMob revenue data for years 2022, 2023, and partial-year 2024 (GOOG-RDGZ-02111197), App Promo revenue data for years 2022, 2023, and partial-year 2024 (GOOG-RDGZ-02111189, GOOG-RDGZ-02111196), additional information regarding the share of U.S. Google accounts that ever turned sWAA off during the periods July 28, 2020 through July 5, 2024 (GOOG-RDGZ-02111187) and July 6, 2024 through September 23, 2024 (GOOG-RDGZ-02111195), and Google's revised representations of the monthly number of total "active" and "sWAA-enabled" accounts, including "Dashers" and "supervised accounts" (*i.e.*, "unicorns"), for the period May 2020 through July 2024 (GOOG-RDGZ-02111191) and August 2024 through September 2024 (GOOG-RDGZ-02111194). Where it remains necessary, and as detailed in the attached schedules, I have projected certain traffic acquisition costs and corresponding net revenues through September 23, 2024.

⁷ In addition to the Unjust Enrichment calculations summarized in Figure 1, and as noted in Section 9 of my Initial Report, I prepared a series of calculations to apportion Unjust Enrichment damages by operating system (Android, Non-Android, Both), time period (July 1, 2016 – September 23, 2024, July 14, 2017 – September 23, 2024, and July 14, 2018 – September 23, 2024), account type (All Account Types and All Account Types Excluding Dashers and Unicorns), and combinations thereof. See Schedules SS1.2 and SS1.2B. I apportioned unjust enrichment damages by operating system using market share information from the Keegan Survey, adjusted to reflect signed-in rates on different operating systems. See Schedules 12.6 and 1.5. I apportioned unjust enrichment damages by time period by performing prorations of 2017 and 2018, thereby allowing a calculation of total damages from one of three starting points (July 1, 2016, July 14, 2017, and July 14, 2018). See Schedules SS1.3 and SS1.4. I apportioned unjust enrichment damages by account type by first estimating the Dasher and Unicorn Share of Total Google Accounts as determined through my examination of data for the overlapping months presented in GOOG-RDGZ-00204475 and GOOG-RDGZ-02111191 (*i.e.*, May 2020 through October 2022). I then applied this share to my calculations of total unjust enrichment. See Schedules SS13.3 and SS1.2.

Figure 1
Unjust Enrichment: July 1, 2016 to September 23, 2024^{8,9}

	<u>Scenario One</u>	<u>Scenario Two</u>
App Promo	\$1,010,039,734	\$1,010,039,734
AdMob	\$364,384,223	\$533,982,773
Ad Manager	\$123,890,636	\$181,554,143
Total	<u>\$1,498,314,592</u>	<u>\$1,725,576,650</u>

8. Based on the additional information provided by Google since my Initial Report, I was also able to update the total number of Class Members for the full Class Period. As detailed in Schedule SS10.1 and based on the additional information from Google, I determined that there are approximately 98 million Class Members for the full Class Period.¹⁰ The calculations above therefore equate to unjust enrichment per Class Member of approximately \$15.29 (Scenario One) to approximately \$17.61 (Scenario Two).¹¹
9. As was the case with the calculations in my Initial Report, the above unjust enrichment calculations are conservative and underinclusive. For example, they include only three categories of Google revenues (*i.e.*, App Promo, AdMob, and Ad Manager), and they do not include or quantify other revenues and benefits that Google obtained through its use of the at-issue data such as revenues and benefits tied to Google's use of the data in connection with its development of machine learning algorithms and artificial intelligence products.¹² For reference, my unjust

⁸ Schedule SS1.1. As detailed in my Initial Report, my unjust enrichment analyses quantify the portion of Google's U.S. App Promo, AdMob, and Ad Manager app ads revenues and attendant profits attributable to the alleged wrongful conduct under two liability scenarios identified by Counsel. This segmentation is intended to assist the trier of fact in determining Google's unjust enrichment under the assumption that the alleged wrongful conduct caused Google to be unjustly enriched by an amount equal to either (1) The portion of Google's U.S. App Promo, AdMob, and Ad Manager app ads revenues and attendant profits attributable to Google's collection, saving, and/or use of WAA/sWAA-Off Data for purposes of tracking advertising conversions ("Scenario One") or (2) The portion of Google's U.S. App Promo, AdMob, and Ad Manager app ads revenues and attendant profits attributable to Google's collection, saving, and/or use of WAA/sWAA-Off Data for purposes of serving and monetizing advertisements ("Scenario Two").

⁹ While Google represents that traffic acquisition costs ("TACs") as a percentage of Google's corresponding App Promo revenues did not materially change between 2021 and September 23, 2024 (Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025), Google's App Promo revenue data for 2022 and 2023 (GOOG-RDGZ-02111189) indicates that global TACs as a percentage of corresponding App Promo revenues were materially lower than the TAC percentages used throughout my unjust enrichment calculations. See Schedule SS2.4 – II. I present alternative calculations of Google's unjust enrichment assuming these lower TAC percentages for years 2022 through partial-year 2024 at Schedule SS1.1 - II.

¹⁰ Schedule SS10.1.

¹¹ Calculated as \$1,498,314,592 / 97,992,376 and \$1,725,576,650 / 97,992,376, respectively.

¹² See, for example, Hochman Report § VII.F.3 (explaining that, while Google has not identified all products and services improved by WAA/sWAA Off Data, it appears that this data improves at least Google's spam detection services, user experiments, benchmarking, diagnostics, technical support, and other services).

enrichment calculations equate to less than approximately 0.1% of Google's total revenues during the same time period.¹³

3. ACTUAL DAMAGES

Conservative Baseline for Actual Damages

10. My update of actual damages is also straightforward and based on the methodology detailed in my Initial Report. Based on the Court's class certification rulings and additional information produced by Google between August 2024 and February 2025, and using the same methodology detailed in my Initial Report, I updated my actual damages calculations to cover all Class Members for the full Class Period using the same inputs from the Screenwise Panel payments.
11. As detailed in my Initial Report, it is my opinion that the most probative indicator of the harm to WAA/sWAA-Off users (including all Class Members) from Google's collection, saving, and/or use of WAA/sWAA-Off Data (during the full Class Period), and the value of that WAA/sWAA-Off Data (collected by Google from Class Members during the Class Period), is derived from the \$3 monthly compensation to Screenwise Panel participants for using a Screenwise meter app on a single mobile device.¹⁴
12. As stated in my Initial Report, it is my opinion that the baseline payment to Screenwise Panel participants of \$3 per month for using a Screenwise meter app on a single mobile device represents a conservative indicator of the monthly payment necessary for an individual to knowingly surrender the choice to keep their app activity private and allow Google to track all app activity data, regardless of that individual's WAA or sWAA settings.¹⁵
13. My Initial Report included a conservative actual damages calculation based on a single payment of \$3 per Class Member device. As detailed therein, and based on data available at that time, I determined that the total number of Class Member devices through December 2022 was 162,015,424, yielding total actual damages of \$486,046,273 through December 2022.¹⁶ Given the increased number of Class Members for the full Class Period, the following figure represents an updated actual damages calculation based on the same single \$3 payment per device for all Class Members.

¹³ Calculated as \$1,725,576,650 / \$1,738,610,000,000. See Schedule SS9.1.

¹⁴ Initial Report, ¶ 131.

¹⁵ Initial Report, ¶ 131.

¹⁶ Initial Report, Schedule 10.1.

Figure 2
Actual Damages Based on Single \$3 Payment per Device: July 1, 2016 to September 23, 2024¹⁷

	<u>Gmail Google Accounts</u>	<u>Non-Gmail Google Accounts</u>	<u>Total</u>
Class Member Devices	163,310,777	11,216,377	174,527,154
Selected Payment per Class Member Device	<u>\$3.00</u>	<u>\$3.00</u>	<u>\$3.00</u>
Actual Damages	<u>\$489,932,332</u>	<u>\$33,649,131</u>	<u>\$523,581,463</u>

14. The figure above includes my calculation of Class Members with non-Gmail Google Accounts based on information Google only provided after my Initial Report. Consistent with the methodology detailed in my Initial Report, I first apportion my calculation of U.S. Smartphone Users into two groups: those with and those without Gmail Accounts. Whereas the actual damages calculations detailed in my Initial Report were conservatively based only on apportionments of the former (*i.e.*, U.S. Smartphone Users with Gmail Accounts), Google's recent disclosures regarding Google Accounts associated with non-Gmail email addresses allow for further analysis and apportionment of the latter (*i.e.*, U.S. Smartphone Users without Gmail Accounts). More specifically, these disclosures provide a reasonable basis to estimate the subset of U.S. Smartphone Users with Google Accounts associated only with non-Gmail email addresses. Consistent with the methodology detailed in my Initial Report, U.S. Smartphone Users With and Without Gmail Accounts are then further apportioned to reflect the share of U.S. Google Accounts where sWAA was turned off at any time. The subset based on U.S. Smartphone Users Without Gmail Accounts is then further apportioned by the Share of sWAA-Off Google Accounts Associated with Non-Gmail Email Addresses. The resulting Class Members with Gmail Accounts and Class Members with Non-Gmail Google Accounts are then multiplied by the average number of mobile devices per person, resulting in the total number of Class Member Devices.

4. OBSERVATIONS PERTAINING TO NOMINAL DAMAGES

15. In its certification order, the Court included a reference to nominal damages.¹⁸ I do not offer any opinion on the amount of nominal damages appropriate in this matter, but I note the following observations that I understand could be considered in calculating nominal damages:
- Number of Class Members: Approximately 98 million (97,992,376);¹⁹
 - Number of Class Member Devices: Approximately 175 million (174,527,154);²⁰
 - Number of Class Member Accounts: Approximately 439 million (438,699,649).²¹

¹⁷ Schedule SS10.1.

¹⁸ Dkt. 352, p. 14.

¹⁹ Schedule SS10.1.

²⁰ Schedule SS10.1.

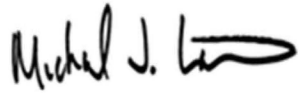
²¹ Google's Responses to Questions from the Class Notice Administrator (June 7, 2024), pp. 1-2.

5. APPORTIONING MONETARY RELIEF TO THE CLASSES AND CLASS MEMBERS

16. As discussed in Section 9 of my Initial Report, my calculations of monetary relief can be readily apportioned across the two Classes and among Class Members, and I detailed therein various apportionment methods. The apportionment methods detailed in my Initial Report are equally applicable to the updated calculations discussed above.

6. SIGNATURE

Respectfully,

A handwritten signature in black ink, appearing to read "Michael J. Lasinski", written over a horizontal line.

Michael J. Lasinski

April 25, 2025

Date

Rodriguez et al v. Google LLC et al.

SUMMARY - UNJUST ENRICHMENT BY PRODUCT - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS1.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Including Dasher and Unicorn Accounts					
	July 1, 2016 - September 23, 2024		July 14, 2017 - September 23, 2024		July 14, 2018 - September 23, 2024	
	Scenario One	Scenario Two	Scenario One	Scenario Two	Scenario One	Scenario Two
App Promo	\$1,984,564,400	\$1,984,564,400	\$1,975,651,235	\$1,975,651,235	\$1,967,923,141	\$1,967,923,141
AdMob	\$284,736,158	\$417,263,410	\$258,561,731	\$378,906,389	\$235,867,384	\$345,649,213
Ad Manager	\$96,810,294	\$141,869,559	\$87,910,988	\$128,828,172	\$80,194,911	\$117,520,732
Total	<u>\$2,366,110,852</u>	<u>\$2,543,697,370</u>	<u>\$2,322,123,954</u>	<u>\$2,483,385,796</u>	<u>\$2,283,985,436</u>	<u>\$2,431,093,086</u>

	Excluding Dasher and Unicorn Accounts					
	July 1, 2016 - September 23, 2024		July 14, 2017 - September 23, 2024		July 14, 2018 - September 23, 2024	
	Scenario One	Scenario Two	Scenario One	Scenario Two	Scenario One	Scenario Two
App Promo	\$1,784,293,592	\$1,784,293,592	\$1,776,279,893	\$1,776,279,893	\$1,769,331,673	\$1,769,331,673
AdMob	\$256,002,225	\$375,155,590	\$232,469,170	\$340,669,338	\$212,065,006	\$310,768,286
Ad Manager	\$87,040,757	\$127,552,901	\$79,039,518	\$115,827,575	\$72,102,102	\$105,661,217
Total	<u>\$2,127,336,574</u>	<u>\$2,287,002,083</u>	<u>\$2,087,788,580</u>	<u>\$2,232,776,806</u>	<u>\$2,053,498,781</u>	<u>\$2,185,761,176</u>

Note:

Schedule SS1.2 - II.

Rodriguez et al v. Google LLC et al.

SUMMARY - UNJUST ENRICHMENT SCENARIOS ONE AND TWO BY PRODUCT AND CLASS, INCLUDING AND EXCLUDING DASHER AND UNICORN ACCOUNTS - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS1.2 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Including Dasher and Unicorn Accounts						Dasher and Unicorn Account Share (3)	Excluding Dasher and Unicorn Accounts					
	July 1, 2016 - September 23, 2024		July 14, 2017 - September 23, 2024		July 14, 2018 - September 23, 2024			July 1, 2016 - September 23, 2024		July 14, 2017 - September 23, 2024		July 14, 2018 - September 23, 2024	
	Scenario One (1)	Scenario Two (2)	Scenario One (1)	Scenario Two (2)	Scenario One (1)	Scenario Two (2)		Scenario One	Scenario Two	Scenario One	Scenario Two	Scenario One	Scenario Two
App Promo													
Class 1	\$1,230,521,324	\$1,230,521,324	\$1,224,994,752	\$1,224,994,752	\$1,220,202,977	\$1,220,202,977	10.09%	\$1,106,344,200	\$1,106,344,200	\$1,101,375,338	\$1,101,375,338	\$1,097,067,121	\$1,097,067,121
Class 2	\$754,043,076	\$754,043,076	\$750,656,483	\$750,656,483	\$747,720,163	\$747,720,163	10.09%	\$677,949,392	\$677,949,392	\$674,904,555	\$674,904,555	\$672,264,552	\$672,264,552
Total	\$1,984,564,400	\$1,984,564,400	\$1,975,651,235	\$1,975,651,235	\$1,967,923,141	\$1,967,923,141	N/A	\$1,784,293,592	\$1,784,293,592	\$1,776,279,893	\$1,776,279,893	\$1,769,331,673	\$1,769,331,673
AdMob													
Class 1	\$176,549,531	\$258,722,531	\$160,320,181	\$234,939,411	\$146,248,641	\$214,318,431	10.09%	\$158,733,170	\$232,613,743	\$144,141,591	\$211,230,679	\$131,490,070	\$192,690,649
Class 2	\$108,186,627	\$158,540,879	\$98,241,550	\$143,966,978	\$89,618,743	\$131,330,783	10.09%	\$97,269,056	\$142,541,847	\$88,327,579	\$129,438,660	\$80,574,936	\$118,077,637
Total	\$284,736,158	\$417,263,410	\$258,561,731	\$378,906,389	\$235,867,384	\$345,649,213	N/A	\$256,002,225	\$375,155,590	\$232,469,170	\$340,669,338	\$212,065,006	\$310,768,286
Ad Manager													
Class 1	\$60,026,841	\$87,965,660	\$54,508,861	\$79,879,400	\$49,724,538	\$72,868,266	10.09%	\$53,969,278	\$79,088,673	\$49,008,141	\$71,818,431	\$44,706,624	\$65,514,821
Class 2	\$36,783,453	\$53,903,899	\$33,402,127	\$48,948,772	\$30,470,373	\$44,652,466	10.09%	\$33,071,479	\$48,464,228	\$30,031,377	\$44,009,144	\$27,395,478	\$40,146,396
Total	\$96,810,294	\$141,869,559	\$87,910,988	\$128,828,172	\$80,194,911	\$117,520,732	N/A	\$87,040,757	\$127,552,901	\$79,039,518	\$115,827,575	\$72,102,102	\$105,661,217
Total	\$2,366,110,852	\$2,543,697,370	\$2,322,123,954	\$2,483,385,796	\$2,283,985,436	\$2,431,093,086	N/A	\$2,127,336,574	\$2,287,002,083	\$2,087,788,580	\$2,232,776,806	\$2,053,498,781	\$2,185,761,176
Total Class 1	\$1,467,097,696	\$1,577,209,516	\$1,439,823,794	\$1,539,813,563	\$1,416,176,156	\$1,507,389,674	N/A	\$1,319,046,648	\$1,418,046,616	\$1,294,525,070	\$1,384,424,447	\$1,273,263,816	\$1,355,272,591
Total Class 2	\$899,013,156	\$966,487,854	\$882,300,160	\$943,572,233	\$867,809,280	\$923,703,412	N/A	\$808,289,927	\$868,955,467	\$793,263,510	\$848,352,359	\$780,234,966	\$830,488,584

Notes:

(1) Schedule SS1.3 - II.

(2) Schedule SS1.4 - II.

(3) Schedule SS13.3.

Rodriguez et al v. Google LLC et al.

SUMMARY - UNJUST ENRICHMENT SCENARIOS ONE AND TWO BY CLASS, TIME PERIOD, AND ACCOUNT TYPE - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189
Schedule SS1.2B - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Class	Time Period	Account Type	Unjust Enrichment	
			Scenario One	Scenario Two
Class 1	July 1, 2016 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$1,467,097,696	\$1,577,209,516
Class 1	July 1, 2016 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$1,319,046,648	\$1,418,046,616
Class 1	July 14, 2017 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$1,439,823,794	\$1,539,813,563
Class 1	July 14, 2017 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$1,294,525,070	\$1,384,424,447
Class 1	July 14, 2018 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$1,416,176,156	\$1,507,389,674
Class 1	July 14, 2018 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$1,273,263,816	\$1,355,272,591
Class 2	July 1, 2016 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$899,013,156	\$966,487,854
Class 2	July 1, 2016 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$808,289,927	\$868,955,467
Class 2	July 14, 2017 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$882,300,160	\$943,572,233
Class 2	July 14, 2017 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$793,263,510	\$848,352,359
Class 2	July 14, 2018 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$867,809,280	\$923,703,412
Class 2	July 14, 2018 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$780,234,966	\$830,488,584
Total	July 1, 2016 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$2,366,110,852	\$2,543,697,370
Total	July 1, 2016 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$2,127,336,574	\$2,287,002,083
Total	July 14, 2017 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$2,322,123,954	\$2,483,385,796
Total	July 14, 2017 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$2,087,788,580	\$2,232,776,806
Total	July 14, 2018 - September 23, 2024	All Account Types (Including Dasher and Unicorn Accounts)	\$2,283,985,436	\$2,431,093,086
Total	July 14, 2018 - September 23, 2024	Excluding Dasher and Unicorn Accounts	\$2,053,498,781	\$2,185,761,176

Source:

Schedule SS1.2 - II.

Rodriguez et al v. Google LLC et al.

EXAMPLE APPORTIONMENT OF UNJUST ENRICHMENT TO CLASSES - SCENARIO ONE - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS1.3 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Scenario One Total - Both Classes													
	Jul. - Dec. 2016	Jan. 1, 2017 - Jul. 13, 2017	Jul. 14, 2017 - Dec. 31, 2017	Jan. 1, 2018 - Jul. 13, 2018	Jul. 14, 2018 - Dec. 31, 2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total	Total Jul. 14, 2017 - Sep. 23, 2024	Total Jul. 14, 2018 - Sep. 23, 2024
App Promo (1)	\$4,639,297	\$4,273,867	\$3,767,172	\$3,960,923	\$3,491,329	\$13,491,271	\$62,315,818	\$200,708,830	\$481,484,104	\$645,796,881	\$560,634,908	\$1,984,564,400	\$1,975,651,235	\$1,967,923,141
AdMob (2)	\$13,623,775	\$12,550,653	\$11,062,689	\$11,631,658	\$10,252,647	\$22,695,692	\$32,852,792	\$61,796,373	\$22,363,057	\$50,525,354	\$35,381,470	\$284,736,158	\$258,561,731	\$235,867,384
Ad Manager (3)	\$4,632,084	\$4,267,222	\$3,761,314	\$3,954,764	\$3,485,900	\$7,716,535	\$11,169,949	\$21,010,767	\$7,603,439	\$17,178,620	\$12,029,700	\$96,810,294	\$87,910,988	\$80,194,911
Total Scenario One - Both Classes	\$22,895,156	\$21,091,742	\$18,591,175	\$19,547,344	\$17,229,875	\$43,903,497	\$106,338,559	\$283,515,969	\$511,450,601	\$713,500,855	\$608,046,078	\$2,366,110,852	\$2,322,123,954	\$2,283,985,436
Class 1 Apportionment Factor (4)	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%
Class 2 Apportionment Factor (4)	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%
	Scenario One - Class 1													
App Promo	\$2,876,578	\$2,649,995	\$2,335,820	\$2,455,954	\$2,164,785	\$8,365,209	\$38,638,677	\$124,448,718	\$298,542,319	\$400,423,807	\$347,619,462	\$1,230,521,324	\$1,224,994,752	\$1,220,202,977
AdMob	\$8,447,368	\$7,781,983	\$6,859,376	\$7,212,163	\$6,357,113	\$14,072,374	\$20,370,244	\$38,316,597	\$13,866,125	\$31,328,046	\$21,938,141	\$176,549,531	\$160,320,181	\$146,248,641
Ad Manager	\$2,872,105	\$2,645,874	\$2,332,188	\$2,452,136	\$2,161,418	\$4,784,607	\$6,925,883	\$13,027,643	\$4,714,483	\$10,651,536	\$7,458,968	\$60,026,841	\$54,508,861	\$49,724,538
Total Scenario One - Class 1	\$14,196,051	\$13,077,851	\$11,527,384	\$12,120,254	\$10,683,316	\$27,222,190	\$65,934,804	\$175,792,958	\$317,122,927	\$442,403,389	\$377,016,571	\$1,467,097,696	\$1,439,823,794	\$1,416,176,156
	Scenario One - Class 2													
App Promo	\$1,762,719	\$1,623,873	\$1,431,352	\$1,504,968	\$1,326,544	\$5,126,062	\$23,677,141	\$76,260,112	\$182,941,785	\$245,373,073	\$213,015,446	\$754,043,076	\$750,656,483	\$747,720,163
AdMob	\$5,176,407	\$4,768,670	\$4,203,312	\$4,419,494	\$3,895,534	\$8,623,318	\$12,482,548	\$23,479,776	\$8,496,932	\$19,197,308	\$13,443,329	\$108,186,627	\$98,241,550	\$89,618,743
Ad Manager	\$1,759,978	\$1,621,348	\$1,429,126	\$1,502,628	\$1,324,481	\$2,931,928	\$4,244,066	\$7,983,124	\$2,888,957	\$6,527,085	\$4,570,732	\$36,783,453	\$33,402,127	\$30,470,373
Total Scenario One - Class 2	\$8,699,105	\$8,013,891	\$7,063,790	\$7,427,091	\$6,546,559	\$16,681,307	\$40,403,755	\$107,723,011	\$194,327,674	\$271,097,466	\$231,029,507	\$899,013,156	\$882,300,160	\$867,809,280

Notes:

(1) Schedule SS2.1 - II.

(2) Schedule SS3.3 - II.

(3) Schedule SS4.3 - II.

(4) Initial Report, Schedule 1.5.

Rodriguez et al v. Google LLC et al.

EXAMPLE APPORTIONMENT OF UNJUST ENRICHMENT TO CLASSES - SCENARIO TWO - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS1.4 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Scenario Two Total - Both Classes													
	Jul. - Dec. 2016	Jan. 1, 2017 - Jul. 13, 2017	Jul. 14, 2017 - Dec. 31, 2017	Jan. 1, 2018 - Jul. 13, 2018	Jul. 14, 2018 - Dec. 31, 2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total	Total Jul. 14, 2017 - Sep. 23, 2024	Total Jul. 14, 2018 - Sep. 23, 2024
App Promo (1)	\$4,639,297	\$4,273,867	\$3,767,172	\$3,960,923	\$3,491,329	\$13,491,271	\$62,315,818	\$200,708,830	\$481,484,104	\$645,796,881	\$560,634,908	\$1,984,564,400	\$1,975,651,235	\$1,967,923,141
AdMob (2)	\$19,964,809	\$18,392,213	\$16,211,693	\$17,045,482	\$15,024,626	\$33,259,147	\$48,143,755	\$90,558,801	\$32,771,691	\$74,041,813	\$51,849,379	\$417,263,410	\$378,906,389	\$345,649,213
Ad Manager (3)	\$6,788,035	\$6,253,352	\$5,511,976	\$5,795,464	\$5,108,373	\$11,308,110	\$16,368,877	\$30,789,992	\$11,142,375	\$25,174,216	\$17,628,789	\$141,869,559	\$128,828,172	\$117,520,732
Total Scenario Two - Both Classes	\$31,392,141	\$28,919,433	\$25,490,840	\$26,801,869	\$23,624,328	\$58,058,527	\$126,828,450	\$322,057,624	\$525,398,171	\$745,012,911	\$630,113,076	\$2,543,697,370	\$2,483,385,796	\$2,431,093,086
Class 1 Apportionment Factor (4)	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%	62.00%
Class 2 Apportionment Factor (4)	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%	38.00%
	Scenario Two - Class 1													
App Promo	\$2,876,578	\$2,649,995	\$2,335,820	\$2,455,954	\$2,164,785	\$8,365,209	\$38,638,677	\$124,448,718	\$298,542,319	\$400,423,807	\$347,619,462	\$1,230,521,324	\$1,224,994,752	\$1,220,202,977
AdMob	\$12,379,101	\$11,404,019	\$10,051,996	\$10,568,984	\$9,315,960	\$20,622,203	\$29,851,345	\$56,150,627	\$20,319,958	\$45,909,334	\$32,149,003	\$258,722,531	\$234,939,411	\$214,318,431
Ad Manager	\$4,208,894	\$3,877,367	\$3,417,679	\$3,593,455	\$3,167,426	\$7,011,549	\$10,149,457	\$19,091,213	\$6,908,786	\$15,609,174	\$10,930,661	\$87,965,660	\$79,879,400	\$72,868,266
Total Scenario Two - Class 1	\$19,464,573	\$17,931,380	\$15,805,495	\$16,618,393	\$14,648,171	\$35,998,961	\$78,639,480	\$199,690,559	\$325,771,062	\$461,942,315	\$390,699,126	\$1,577,209,516	\$1,539,813,563	\$1,507,389,674
	Scenario Two - Class 2													
App Promo	\$1,762,719	\$1,623,873	\$1,431,352	\$1,504,968	\$1,326,544	\$5,126,062	\$23,677,141	\$76,260,112	\$182,941,785	\$245,373,073	\$213,015,446	\$754,043,076	\$750,656,483	\$747,720,163
AdMob	\$7,585,708	\$6,988,194	\$6,159,697	\$6,476,498	\$5,708,666	\$12,636,944	\$18,292,410	\$34,408,174	\$12,451,733	\$28,132,479	\$19,700,376	\$158,540,879	\$143,966,978	\$131,330,783
Ad Manager	\$2,579,141	\$2,375,986	\$2,094,297	\$2,202,009	\$1,940,946	\$4,296,561	\$6,219,419	\$11,698,779	\$4,233,589	\$9,565,043	\$6,698,128	\$53,903,899	\$48,948,772	\$44,652,466
Total Scenario Two - Class 2	\$11,927,568	\$10,988,053	\$9,685,345	\$10,183,476	\$8,976,157	\$22,059,567	\$48,188,970	\$122,367,065	\$199,627,108	\$283,070,595	\$239,413,950	\$966,487,854	\$943,572,233	\$923,703,412

Notes:

(1) Schedule SS2.1 - II.

(2) Schedule SS3.1 - II.

(3) Schedule SS4.1 - II.

(4) Initial Report, Schedule 1.5.

Rodriguez et al v. Google LLC et al.

APP PROMO TOTAL UNJUST ENRICHMENT - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS2.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
App Promo Signed-In sWAA Off U.S. Revenue Net of Traffic Acquisition Costs (1)	\$77,321,623	\$134,017,322	\$124,204,189	\$127,276,139	\$211,958,565	\$406,293,178	\$877,020,226	\$978,480,123	\$795,226,820	\$3,731,798,185
Share of Revenue Attributable to Conversion Types Bid Against GA4F (2)	6.0%	6.0%	6.0%	10.6%	29.4%	49.4%	54.9%	66.0%	70.5%	N/A
App Promo Total Unjust Enrichment	<u>\$4,639,297</u>	<u>\$8,041,039</u>	<u>\$7,452,251</u>	<u>\$13,491,271</u>	<u>\$62,315,818</u>	<u>\$200,708,830</u>	<u>\$481,484,104</u>	<u>\$645,796,881</u>	<u>\$560,634,908</u>	<u>\$1,984,564,400</u>

Notes:

(1) Schedule SS2.2 - II.

(2) Partial-year 2016 through 2022 per Defendant Google LLC's Supplemental Objections and Responses to Plaintiffs' Interrogatories, Set Six (Nos. 12, 16, & 17), Supplemental Response to ROG 17, pp. 15-16.

2023 and partial-year 2024 per Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025, Stipulation Nos. 16-17.

Sources represent that these revenue shares correspond to specific dates, as compared to annual averages.

Rodriguez et al v. Google LLC et al.

APP PROMO SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS2.2 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017 (1)	2018 (1)	2019 (1)	2020 (2)	2021 (2)	2022 (3)	2023 (4)	Jan. - Sep. 23 2024 (4)	Total
App Promo U.S. Booked Revenue	N/A	\$1,395,000,000	\$2,396,000,000	\$2,781,000,000	\$3,765,177,240	\$5,760,192,037	\$5,473,898,218	\$5,735,390,234	\$4,661,560,588	\$31,968,218,317 (10)
App Promo U.S. Traffic Acquisition Costs (5)	N/A	\$905,000,000	\$1,683,000,000	\$1,921,000,000	\$2,604,914,466	\$3,911,868,710	\$1,398,380,426	\$1,346,474,186	\$1,094,375,577	\$14,865,013,366 (10)
TAC Share of Booked Revenue (6)	N/A	64.87%	70.24%	69.08%	69.18%	67.91%	25.55%	23.48%	23.48%	N/A
App Promo U.S. Revenue Net of Traffic Acquisition Costs (7)	\$136,111,111	\$490,000,000	\$713,000,000	\$860,000,000	\$1,160,262,774	\$1,848,323,327	\$4,075,517,791	\$4,388,916,048	\$3,567,185,011	\$17,239,316,062
YoY Growth Rate	N/A	N/A	45.51%	20.62%	34.91%	59.30%	120.50%	7.69%	N/A	N/A
Share of Revenue from Signed-In Users (8)	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	N/A
App Promo Signed-In U.S. Revenue Net of Traffic Acquisition Costs	\$111,850,566	\$402,662,037	\$585,914,352	\$706,712,963	\$953,456,677	\$1,518,876,808	\$3,349,094,481	\$3,606,632,401	\$2,931,367,312	\$14,166,567,597
Share of Monthly Accounts with sWAA Off (9)	69.13%	33.28%	21.20%	18.01%	22.23%	26.75%	26.19%	27.13%	27.13%	N/A
App Promo Signed-In sWAA Off U.S. Revenue Net of Traffic Acquisition Costs	<u>\$77,321,623</u>	<u>\$134,017,322</u>	<u>\$124,204,189</u>	<u>\$127,276,139</u>	<u>\$211,958,565</u>	<u>\$406,293,178</u>	<u>\$877,020,226</u>	<u>\$978,480,123</u>	<u>\$795,226,820</u>	<u>\$3,731,798,185</u>

Notes:

(1) 2017-2019 App Promo U.S. Booked Revenue per GOOG-RDGZ-00184247.

(2) 2020-2021 App Promo U.S. Booked Revenue per GOOG-RDGZ-00185743, tab "Data." See also Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025, Stipulation No. 2.

(3) 2022 App Promo U.S. Booked Revenue per Schedule SS8.4. See also Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025, Stipulation Nos. 8-10. I understand from Stipulation No. 10 that

"For the period after Google updated its P&L reporting structure, Google's 'billed' revenue from App Promo ads is the best available proxy, or substitute, for Google's 'booked' revenue from App Promo ads."

(4) 2023 and 2024 App Promo U.S. Booked Revenue per GOOG-RDGZ-02111196. 2024 revenue prorated to reflect only January - September 23. See Joint Stipulation on Google's Supplemental Financial Productions,

April 18, 2025, Stipulation Nos. 8-11. I understand from Stipulation No. 10 that "For the period after Google updated its P&L reporting structure, Google's 'billed' revenue from App Promo ads is the best available proxy, or substitute, for Google's 'booked' revenue from App Promo ads."

(5) 2017-2019 per GOOG-RDGZ-00184247. 2020 - Sep. 23, 2024 calculated based on TAC Share of Booked Revenue. See Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025, Stipulation No. 14.

(6) 2022 calculated as (\$2,604.1 / \$3,764) based on 2020 booked revenue and TAC per GOOG-RDGZ-00184247. 2021 calculated as (\$4,235 / \$6,236) based on 2021 booked revenue and TAC per GOOG-RDGZ-00185744.

2022-2023 per Schedule SS2.4 - II. Jan. - Sep. 23, 2024 held constant from 2023.

(7) Partial-year 2016 per Initial Report, Schedule 7.2.

(8) Initial Report, Schedule 15.1.

(9) Schedule SS13.1.

(10) Total calculated for the period from 2017 through September 23, 2024.

Rodriguez et al v. Google LLC et al.

APP PROMO TAC AS PERCENT OF BILLED REVENUE - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS2.4 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	<u>2022</u>	<u>2023</u>
App Promo Global Served Revenue (1)	\$18,641,931,346	\$18,252,187,220
App Promo Billed Revenue as Percent of Served Revenue (2)	<u>97%</u>	<u>97%</u>
App Promo Global Billed Revenue	\$18,106,832,275	\$17,728,275,387
App Promo Global TAC (1)	<u>\$4,625,632,197</u>	<u>\$4,161,994,947</u>
App Promo TAC as Percent of Billed Revenue	<u>25.55%</u>	<u>23.48%</u>

Notes:

(1) GOOG-RDGZ-02111189 at tab "Follow Up Output." See also Joint Stipulation on Google's Supplemental Financial Productions, April 18, 2025, Stipulation Nos. 5-6.

(2) Schedule SS2.3.

Rodriguez et al v. Google LLC et al.

ADMOB TOTAL UNJUST ENRICHMENT - SCENARIO TWO - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS3.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	<u>Jul. - Dec. 2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>Jan. - Sep. 23 2024</u>	<u>Total</u>
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Attributable to Conversion Tracking (1)	\$13,623,775	\$23,613,341	\$21,884,305	\$22,695,692	\$32,852,792	\$61,796,373	\$22,363,057	\$50,525,354	\$35,381,470	\$284,736,158
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Not Attributable to Conversion Tracking and Adjusted for Diminished Ad Relevance with sWAA Off (2)	\$6,341,033	\$10,990,565	\$10,185,804	\$10,563,455	\$15,290,964	\$28,762,429	\$10,408,634	\$23,516,459	\$16,467,909	\$132,527,252
AdMob Total Unjust Enrichment - Scenario Two	<u>\$19,964,809</u>	<u>\$34,603,906</u>	<u>\$32,070,109</u>	<u>\$33,259,147</u>	<u>\$48,143,755</u>	<u>\$90,558,801</u>	<u>\$32,771,691</u>	<u>\$74,041,813</u>	<u>\$51,849,379</u>	<u>\$417,263,410</u>

Notes:

(1) Schedule SS3.3 - II.

(2) Schedule SS3.2 - II.

Rodriguez et al v. Google LLC et al.

ADMOB SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-ADMOB OVERLAP) NOT ATTRIBUTABLE TO CONVERSION TRACKING AND ADJUSTED FOR DIMINISHED AD RELEVANCE WITH SWAA OFF - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS3.2 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) (1)	\$26,199,568	\$45,410,272	\$42,085,201	\$43,645,561	\$63,178,446	\$118,839,178	\$43,005,879	\$97,164,142	\$68,041,289	\$547,569,535
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Attributable to Conversion Tracking (2)	\$13,623,775	\$23,613,341	\$21,884,305	\$22,695,692	\$32,852,792	\$61,796,373	\$22,363,057	\$50,525,354	\$35,381,470	\$284,736,158
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Not Attributable to Conversion Tracking	\$12,575,792	\$21,796,930	\$20,200,897	\$20,949,869	\$30,325,654	\$57,042,806	\$20,642,822	\$46,638,788	\$32,659,819	\$262,833,377
Apportionment for Diminished Ad Relevance with sWAA Off (3)	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	N/A
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Not Attributable to Conversion Tracking and Adjusted for Diminished Ad Relevance with sWAA Off	\$6,341,033	\$10,990,565	\$10,185,804	\$10,563,455	\$15,290,964	\$28,762,429	\$10,408,634	\$23,516,459	\$16,467,909	\$132,527,252

Notes:

(1) Schedule SS3.4 - II.

(2) Schedule SS3.3 - II.

(3) Initial Report, Schedule 14.1. See also, Initial Report Section 7.2.2.

Rodriguez et al v. Google LLC et al.

ADMOB SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-ADMOB OVERAP) ATTRIBUTABLE TO CONVERSION TRACKING - SCENARIO ONE - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS3.3 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) ⁽¹⁾	\$26,199,568	\$45,410,272	\$42,085,201	\$43,645,561	\$63,178,446	\$118,839,178	\$43,005,879	\$97,164,142	\$68,041,289	\$547,569,535
Share of Revenues Attributable to Conversion Tracking ⁽²⁾	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	N/A
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap) Attributable to Conversion Tracking	<u>\$13,623,775</u>	<u>\$23,613,341</u>	<u>\$21,884,305</u>	<u>\$22,695,692</u>	<u>\$32,852,792</u>	<u>\$61,796,373</u>	<u>\$22,363,057</u>	<u>\$50,525,354</u>	<u>\$35,381,470</u>	<u>\$284,736,158</u>

Notes:

(1) Schedule SS3.4 - II.

(2) GOOG-RDGZ-00188469-491 at 475. Represented on source document as "Conversion Based Autobidding Proportion."

Rodriguez et al v. Google LLC et al.

ADMOB SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-ADMOB OVERLAP) - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS3.4 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	<u>Jul. - Dec. 2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>Jan. - Sep. 23 2024</u>	<u>Total</u>
AdMob U.S. Revenue Net of Traffic Acquisition Costs (1)	\$63,281,310	\$227,812,718	\$331,490,750	\$403,344,560	\$505,681,188	\$819,838,800	\$824,540,773	\$787,096,213	\$546,244,432	\$4,509,330,744
App Promo-AdMob Overlap - U.S. Revenue Net of TAC (2)	<u>\$17,161,582</u>	<u>\$61,781,695</u>	<u>\$89,898,670</u>	<u>\$108,433,178</u>	<u>\$159,841,903</u>	<u>\$279,211,399</u>	<u>\$624,692,217</u>	<u>\$351,272,069</u>	<u>\$241,028,535</u>	<u>\$1,933,321,246</u>
AdMob U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap)	\$46,119,729	\$166,031,023	\$241,592,080	\$294,911,382	\$345,839,286	\$540,627,401	\$199,848,556	\$435,824,144	\$305,215,897	\$2,576,009,498
Share of Revenue from Signed-In Users (3)	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	<u>82.18%</u>	N/A
AdMob Signed-In U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap)	\$37,899,314	\$136,437,531	\$198,530,529	\$242,346,158	\$284,196,635	\$444,265,573	\$164,227,401	\$358,142,526	\$250,813,990	\$2,116,859,657
Share of Monthly Accounts with sWAA Off (4)	<u>69.13%</u>	<u>33.28%</u>	<u>21.20%</u>	<u>18.01%</u>	<u>22.23%</u>	<u>26.75%</u>	<u>26.19%</u>	<u>27.13%</u>	<u>27.13%</u>	N/A
AdMob Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-AdMob Overlap)	<u>\$26,199,568</u>	<u>\$45,410,272</u>	<u>\$42,085,201</u>	<u>\$43,645,561</u>	<u>\$63,178,446</u>	<u>\$118,839,178</u>	<u>\$43,005,879</u>	<u>\$97,164,142</u>	<u>\$68,041,289</u>	<u>\$547,569,535</u>

Notes:

(1) Schedule SS6.1.

(2) Schedule SS5.1 - II.

(3) Initial Report, Schedule 15.1.

(4) Schedule SS13.1.

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AD MANAGER TOTAL UNJUST ENRICHMENT - SCENARIO TWO - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS4.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	<u>Jul. - Dec.</u> <u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>Jan. - Sep. 23</u> <u>2024</u>	<u>Total</u>
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) Attributable to Conversion Tracking (1)	\$4,632,084	\$8,028,536	\$7,440,664	\$7,716,535	\$11,169,949	\$21,010,767	\$7,603,439	\$17,178,620	\$12,029,700	\$96,810,294
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) Not Attributable to Conversion Tracking and Adjusted for Diminished Ad Relevance with sWAA Off (2)	\$2,155,951	\$3,736,792	\$3,463,173	\$3,591,575	\$5,198,928	\$9,779,226	\$3,538,936	\$7,995,596	\$5,599,089	\$45,059,266
Ad Manager Total Unjust Enrichment - Scenario Two	<u>\$6,788,035</u>	<u>\$11,765,328</u>	<u>\$10,903,837</u>	<u>\$11,308,110</u>	<u>\$16,368,877</u>	<u>\$30,789,992</u>	<u>\$11,142,375</u>	<u>\$25,174,216</u>	<u>\$17,628,789</u>	<u>\$141,869,559</u>

Notes:

(1) Schedule SS4.3 - II.

(2) Schedule SS4.2 - II.

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AD MANAGER SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-AD MANAGER OVERLAP) NOT ATTRIBUTABLE TO CONVERSION TRACKING AND ADJUSTED FOR DIMINISHED AD RELEVANCE WITH SWAA OFF - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189
Schedule SS4.2 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) (1)	\$8,907,853	\$15,439,492	\$14,308,968	\$14,839,491	\$21,480,672	\$40,405,321	\$14,621,999	\$33,035,808	\$23,134,038	\$186,173,642
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo- Ad Manager Overlap) Attributable to Conversion Tracking (2)	\$4,632,084	\$8,028,536	\$7,440,664	\$7,716,535	\$11,169,949	\$21,010,767	\$7,603,439	\$17,178,620	\$12,029,700	\$96,810,294
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo- Ad Manager Overlap) Not Attributable to Conversion Tracking	\$4,275,769	\$7,410,956	\$6,868,305	\$7,122,955	\$10,310,722	\$19,394,554	\$7,018,559	\$15,857,188	\$11,104,338	\$89,363,348
Apportionment for Diminished Ad Relevance with sWAA Off (3)	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	50.42%	N/A
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) Not Attributable to Conversion Tracking and Adjusted for Diminished Ad Relevance with sWAA Off	\$2,155,951	\$3,736,792	\$3,463,173	\$3,591,575	\$5,198,928	\$9,779,226	\$3,538,936	\$7,995,596	\$5,599,089	\$45,059,266

Notes:

(1) Schedule SS4.4 - II.

(2) Schedule SS4.3 - II.

(3) Initial Report, Schedule 14.1. See also, Initial Report Section 7.2.3.

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AD MANAGER SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-AD MANAGER OVERLAP) ATTRIBUTABLE TO CONVERSION TRACKING - SCENARIO ONE - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS4.3 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) (1)	\$8,907,853	\$15,439,492	\$14,308,968	\$14,839,491	\$21,480,672	\$40,405,321	\$14,621,999	\$33,035,808	\$23,134,038	\$186,173,642
Share of Revenues Attributable to Conversion Tracking (2)	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	52.00%	N/A
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap) Attributable to Conversion Tracking	<u>\$4,632,084</u>	<u>\$8,028,536</u>	<u>\$7,440,664</u>	<u>\$7,716,535</u>	<u>\$11,169,949</u>	<u>\$21,010,767</u>	<u>\$7,603,439</u>	<u>\$17,178,620</u>	<u>\$12,029,700</u>	<u>\$96,810,294</u>

Notes:

(1) Schedule SS4.4 - II.

(2) GOOG-RDGZ-00188469-491 at 475. Represented on source document as "Conversion Based Autobidding Proportion."

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AD MANAGER SIGNED-IN SWAA OFF U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (EXCLUDING APP PROMO-AD MANAGER OVERLAP) - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS4.4 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
Ad Manager U.S. Revenue Net of Traffic Acquisition Costs (1)	\$21,515,646	\$77,456,324	\$112,706,855	\$137,137,150	\$171,931,604	\$278,745,192	\$280,343,863	\$267,612,712	\$185,723,107	\$1,533,172,453
App Promo-Ad Manager Overlap - U.S. Revenue Net of TAC (2)	\$5,834,938	\$21,005,776	\$30,565,548	\$36,867,281	\$54,346,247	\$94,931,876	\$212,395,354	\$119,432,503	\$81,949,702	\$657,329,224
Ad Manager U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap)	\$15,680,708	\$56,450,548	\$82,141,307	\$100,269,870	\$117,585,357	\$183,813,316	\$67,948,509	\$148,180,209	\$103,773,405	\$875,843,229
Share of Revenue Net of TAC from Signed-In Users (3)	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	82.18%	N/A
Ad Manager Signed-In U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap)	\$12,885,767	\$46,388,760	\$67,500,380	\$82,397,694	\$96,626,856	\$151,050,295	\$55,837,316	\$121,768,459	\$85,276,756	\$719,732,283
Share of Monthly Accounts with sWAA Off (4)	69.13%	33.28%	21.20%	18.01%	22.23%	26.75%	26.19%	27.13%	27.13%	N/A
Ad Manager Signed-In sWAA Off U.S. Revenue Net of TAC (Excluding App Promo-Ad Manager Overlap)	\$8,907,853	\$15,439,492	\$14,308,968	\$14,839,491	\$21,480,672	\$40,405,321	\$14,621,999	\$33,035,808	\$23,134,038	\$186,173,642

Notes:

(1) Schedule SS5.2.

(2) Schedule SS5.1 - II.

(3) Initial Report, Schedule 15.1.

(4) Schedule SS13.1.

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APP PROMO-ADMOB OVERLAP & APP PROMO-AD MANAGER OVERLAP - U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS5.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
App Promo U.S. Display App Revenue Net of TAC (App Promo-Display App Overlap) (1)	\$22,996,520	\$82,787,471	\$120,464,218	\$145,300,459	\$214,188,149	\$374,143,274	\$837,087,570	\$470,704,572	\$322,978,237	\$2,590,650,470
AdMob App Share of Total Sellside App Revenue (2)	74.63%	74.63%	74.63%	74.63%	74.63%	74.63%	74.63%	74.63%	74.63%	N/A
App Promo-AdMob Overlap - U.S. Revenue Net of TAC	<u>\$17,161,582</u>	<u>\$61,781,695</u>	<u>\$89,898,670</u>	<u>\$108,433,178</u>	<u>\$159,841,903</u>	<u>\$279,211,399</u>	<u>\$624,692,217</u>	<u>\$351,272,069</u>	<u>\$241,028,535</u>	<u>\$1,933,321,246</u>
App Promo U.S. Display App Revenue Net of TAC (App Promo-Display App Overlap) (1)	\$22,996,520	\$82,787,471	\$120,464,218	\$145,300,459	\$214,188,149	\$374,143,274	\$837,087,570	\$470,704,572	\$322,978,237	\$2,590,650,470
Ad Manager App Share of Total Sellside App Revenue (2)	25.37%	25.37%	25.37%	25.37%	25.37%	25.37%	25.37%	25.37%	25.37%	N/A
App Promo-Ad Manager Overlap - U.S. Revenue Net of TAC	<u>\$5,834,938</u>	<u>\$21,005,776</u>	<u>\$30,565,548</u>	<u>\$36,867,281</u>	<u>\$54,346,247</u>	<u>\$94,931,876</u>	<u>\$212,395,354</u>	<u>\$119,432,503</u>	<u>\$81,949,702</u>	<u>\$657,329,224</u>

Notes:

(1) Schedule SS7.1 - II.

(2) Initial Report, Schedule 5.3.

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APP PROMO APP DISPLAY U.S. REVENUE NET OF TRAFFIC ACQUISITION COSTS (APP PROMO-APP DISPLAY OVERLAP) - ALTERNATIVE USING APP PROMO TAC LEVELS PER GOOG-RDGZ-02111189

Schedule SS7.1 - II

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

	Jul. - Dec. 2016	2017	2018	2019	2020	2021	2022	2023	Jan. - Sep. 23 2024	Total
App Promo U.S. Revenue Net of TAC (1)	\$136,111,111	\$490,000,000	\$713,000,000	\$860,000,000	\$1,160,262,774	\$1,848,323,327	\$4,075,517,791	\$4,388,916,048	\$3,567,185,011	\$17,239,316,062
YoY Growth Rate	N/A	N/A	45.5%	20.6%	34.9%	59.3%	120.5%	7.7%	N/A	N/A
App Display % of Total App Promo U.S. Booked Revenue (2)	16.90%	16.90%	16.90%	16.90%	18.46%	20.24%	20.54%	10.72%	9.05%	N/A
App Promo App Display U.S. Revenue Net of TAC (App Promo-App Display Overlap)	\$22,996,520	\$82,787,471	\$120,464,218	\$145,300,459	\$214,188,149	\$374,143,274	\$837,087,570	\$470,704,572	\$322,978,237	\$2,590,650,470

Notes:

(1) Schedule SS2.2 - II.

(2) Schedule SS8.1. 2019 share held constant for years 2016-2018.